

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ARLENE J. DELGADO,
Plaintiff,

-vs-

No. 19-cv-11764 (AT) (KHP)

DONALD J. TRUMP FOR PRESIDENT, INC.,
TRUMP FOR AMERICA, INC., SEAN SPICER,
individually, REINCE PRIEBUS, individually,
and STEPHEN BANNON, individually,

Defendants.

NOTICE OF FILING UNREDACTED COPY

Plaintiff, ARLENE J. DELGADO, hereby files the enclosed ATTACHMENT A, due to the Defendants' filing yesterday, entitled DEFENDANTS' MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFF'S MOTION TO REOPEN DISCOVERY (ECF 374, July 3, 2024).

Plaintiff, in an unnecessary abundance of good faith towards *all* involved (both of the individuals named, as well as even the Defendant-Campaign), had, in her Supplement (ECF 367, June 27, 2024), redacted names from the attachment.

However, given the Defendants' filing yesterday (ECF 374), in which Defendants publicly continue to question Plaintiff's integrity and publicly now imply she is, at best, fibbing, and that the advisor who provided Plaintiff this information was probably not, in fact, someone who would be privy to this information (ECF 374, p. 11) and Plaintiff was thus misrepresenting matters...¹ Plaintiff thus has no alternative but to file the unredacted version and does so herein.

The advisor who disclosed this information, given her integrity and honesty, to Plaintiff was Jenna Ellis, Esq.. Ms. Ellis was not only a senior advisor but a senior *legal* advisor. She is an attorney and is credible. She was a highly senior member of the Campaign and precisely in the position to be privy to this information. It is also highly logical that Mr. Glassner would have shared this information with Ms. Ellis in particular.

Will the Defendants still continue to claim there exists "no complaints" to provide to Plaintiff, though they were ordered to provide such? Will their position be that Ms. Ellis

¹ On footnote 5, p. 12, of the Defendant's filing, Defendants claim that Plaintiff refused to respond to a request, dated June 28th, that she privately provide them an unredacted copy and label it Confidential. This is incorrect. Plaintiff *did* respond to the email, the morning of June 30th. See screenshot in Attachment B. That notwithstanding, the Plaintiff could not have *privately* provided an unredacted version to the Defendants, given that the Defendants would reference and rely on such in a *public* response. Material that a party is addressing in public, cannot be privately concealed.

fabricated this all in her mind? Will their position be that Mr. Glassner lied to Ms. Ellis (for no apparent reason), or fabricated this all in his mind? Will their position continue to be that there is no reason to depose Mr. Glassner?

The fact is Defendants are imitating the Wizard of Oz in the third act of the classic film, frantically pulling at levers trying to shut the curtain and shrieking, “Nothing to see here!” when the curtain has already revealed there is. The only question remaining is whether this Court will allow Defendants to get away with it.

DATED: July 4, 2024

s/Arlene Delgado
Arlene Delgado
Plaintiff, *pro-se*

ATTACHMENT A

JE Jenna Ellis

Wed, Jun 12

Jenna, bt us, do you know of anyone who complained of gender discrimination, pregnancy discrimination, or sexual harassment, in the 2020 Campaign?

Do you know if the 2020 Campaign settled any potential lawsuits regarding such?

But please tell me the truth. Thank you 6:39 PM

Thu, Jun 13

Yes. Off record - Boris. The campaign settled multiple suits

Have your investigator subpoena Michael Glassner

I will of course tell you the truth

We may not agree on everything, but I support you. 8:22 PM

ATTACHMENT B

Redactions on ECF No. 367-1



Jeffrey Gavenman <jgavenman@schulmanbh.com>
To: You

Reply Reply all Forward ...

Fri 6/28/2024 7:01 PM

You replied on Sun 6/30/2024 7:34 AM

Ms. Delgado,

You filed a redacted version of ECF No. 367-1 on the docket. So that we may respond to your motion, as the Court has required us to do by July 3, please provide me with an unredacted version of that document. You may designate it as "Confidential" under the Protective Order.

Regards,
Jeff

SCHULMANBHATTACHARYA

Jeffrey S. Gavenman
Member